

)	
Gregg Lurie, Heidi Kaliher, and Tracy Knight individually, and on behalf of those similarly situated,)	Case No. 0:23-cv-00440-KMM-DLM
)	
Plaintiffs,)	PLAINTIFFS' MOTION
v.)	TO POSTPONE THE
)	IDENTIFICATION OF CLASS
North Memorial Health Care, d/b/a North Memorial Health,)	CERTIFICATION EXPERT
)	WITNESSES
Defendant.)	
)	

The parties have met and conferred regarding the current case schedule and agree that modification of the Pretrial Scheduling Order (Dkt. No. 63) is appropriate, however, the parties were unable to meet and confer on this specific modification prior to the deadline. Plaintiffs will file a Meet-and-Confer Statement pursuant to Local Rule 7.1(a)(1)(A). Under the current schedule, fact discovery closes on or before June 1, 2025, and Plaintiffs must file their motion for class certification on or before July 1, 2025. Plaintiffs and North Memorial intend to seek relief from the current schedule because

additional time is required to complete fact discovery and prepare for Plaintiffs' forthcoming motion for class certification and are preparing a proposal to that effect. This forthcoming proposal will provide additional support for modification of the case schedule and will be the first request to modify the schedule in this case.

The Court has scheduled a Status Conference for this case on May 16, 2025, at which time Plaintiffs will be prepared to discuss the case schedule with the Court. Plaintiffs request the Court postpone the deadline to identify their class certification experts pending the parties' forthcoming proposal concerning the case schedule and the May 16, 2025 Status Conference.

Respectfully submitted,

Dated: May 1, 2025

/s/ Rachel K. Tack

Brian C. Gudmundson (MN #336695)
Michael J. Laird (MN #398436)
Rachel K. Tack (MN #399529)
Benjamin R. Cooper (MN #403532)
ZIMMERMAN REED LLP
1100 IDS Center, 80 South Eighth Street
Minneapolis, MN 55402
Telephone: (612) 341-0400
brian.gudmundson@zimmreed.com
michael.laird@zimmreed.com
rachel.tack@zimmreed.com
benjamin.cooper@zimmreed.com

Hart L. Robinovitch
ZIMMERMAN REED LLP
14646 North Kierland Blvd., Suite 145
Scottsdale, AZ 85254
Telephone: (480) 348-6400
hart.robinovitch@zimmreed.com

Nathan D. Prosser (MN #0329745)
HELLMUTH & JOHNSON, PLLC
8050 West Seventy-Eighth Street
Edina, MN 55439
Telephone: (952) 522-4291
nprosser@hjlawfirm.com

David A. Goodwin (MN #0386715)
GUSTAFSON GLUEK PLLC
Canadian Pacific Plaza
120 South 6th Street, Suite 2600
Minneapolis, MN 55402
Telephone: (612) 333-8844
dgoodwin@gustafsongluek.com

Samuel J. Strauss (*Pro Hac Vice* forthcoming)
Raina Borelli (MN # 0392127)
Brittany Resch (MN # 0397656)
STRAUSS BORELLI PLLC
908 N. Michigan Avenue, Suite 1610
Chicago Illinois 60611
Telephone: (872) 263-1100
Facsimile: (872) 263-1109
sam@straussborrelli.com
raina@straussborrelli.com
bresch@straussborrelli.com

Lynn A. Toops (*Pro Hac Vice* forthcoming)
Amina A. Thomas (*Pro Hac Vice* forthcoming)
Mallory K. Schiller (*Pro Hac Vice* forthcoming)
COHEN & MALAD, LLP
One Indiana Square, Suite 1400
Indianapolis, Indiana 46204
Telephone: (317) 636-6481
ltoops@cohenandmalad.com
athomas@cohenandmalad.com
mschiller@cohenandmalad.com

J. Gerard Stranch, IV
(*Pro Hac Vice* forthcoming)
Andrew E. Mize
(*Pro Hac Vice* forthcoming)
STRANCH, JENNINGS & GARVEY, PLLC
The Freedom Center
223 Rosa L. Parks Avenue, Suite 200
Nashville, Tennessee 37203
Telephone: (615) 254-8801
Facsimile: (615) 255-5419
gstranch@stranchlaw.com
amize@stranchlaw.com

Attorneys for Plaintiffs